

FILED
5/23/2021
THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

CC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

21 CR 316

In the Matter of the Search of:

The single-family home located at 1511
Guthrie Drive, Inverness, Illinois,
further described in Attachment A

Case Number:

Jeffrey I. Cummings
Magistrate Judge

UNDER SEAL

**GOVERNMENT'S MOTION TO SEAL
AMENDED SEARCH WARRANT, APPLICATION, AND AFFIDAVIT**

Now comes the UNITED STATES OF AMERICA, by JOHN R. LAUSCH, JR.,
United States Attorney for the Northern District of Illinois, and states as follows in
support of its Motion to Seal Search Warrant, Application, and Affidavit:

On the 23rd day of May, 2021, the government applied for an Amended Search
Warrant in this matter, and submitted an Amended Application and Amended
Affidavit in support. The Amended Search Warrant Affidavit details the facts
supporting probable cause to believe that evidence and instrumentalities concerning
interstate threats, cyberstalking, sex trafficking and child pornography offenses, in
violation of Title 18, United States Code, Sections 875(c), 2261A, 1591, 2422, 2252
and 2252A will be found at 1511 Guthrie Drive, Inverness, Illinois.

The government will continue its investigation after execution of the Search
Warrant, and disclosure of the Application and Affidavit would jeopardize the
investigation by providing the subject of the investigation an opportunity to destroy
evidence or flee, jeopardize the safety of the agents executing the warrant by alerting

the occupants in advance to the execution of the search warrant, and jeopardize the investigation by disclosing the details of facts known to investigators, the identities of witnesses, and the investigative strategy. For the foregoing reasons, the government respectfully requests that the Search Warrant, Application, and Affidavit be sealed for 180 days from the date of this Order, until November 13, 2021, except as necessary to facilitate the enforcement of criminal law, including the execution of the search warrant, or to any federal official to assist the official receiving the information in the performance of that official's duties.

Respectfully submitted,

JOHN R. LAUSCH, JR.
United States Attorney

By: /s/ Kaitlin Klamann
Kaitlin Klamann
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DATE: May 23, 2021